

REMARKS

Claims 116-131 have been added. No claims have been amended or cancelled. Therefore, claims 100-131 are pending in the application.

I. ISSUES RELATED TO THE PRIOR ART – SECTION 103 – *THOMSON AND SRIVASTAVA*

Claims 100-115 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over *Thomson* (US 20040034615) in view of *Srivastava* (US 6549922). The rejection is respectfully traversed.

A. *THOMSON* DOES NOT TEACH WHAT IS ALLEGED, AND *SRIVASTAVA* DOES NOT REMEDY *THOMSON*'S DEFICIENCIES

Claim 100

Claim 100 recites in part:

*“wherein reading said module causes said target ETL application to perform loading said database objects within said target database; wherein said loading includes: ... incorporating within said target database **a tablespace holding data for at least one of said one or more database objects.**”*

No combination of *Thomson* and *Srivastava* teaches or suggests the quoted feature.

The Office Action relies on paragraph [0036], [0050], and [0054] of *Thomson* to allegedly teach this feature. Paragraph [0036] describes the “Business Objects Universe” (BOU) that presents to the user a view of the database that is more business-oriented than the database structure itself. Although the cited passage describes abstracting databases that have tables, it does not describe storing a database map in a table. In fact, it states

that the BOU is “*part repository*.” A repository is not necessarily a database, and objects stored in a repository are not necessarily loaded into tables. Paragraph [0050] states that the Universe comprises a set of objects that are “about” databases. There is no teaching or suggestion that the Universe objects themselves are stored in a database. Paragraph [0054] describes the run time architecture of *Thomson*’s system, stressing that normally server-side databases perform the majority of data processing. There is no mention or description of client-side database loading objects into tables, much less the UDS components performing the loading. Therefore, none of the cited passages describe or in any way mention an ETL application (UDS components) loading data for a database object (report) into a tablespace of a target database system (client database system). Thus, *Thomson* does not teach the quoted feature, and *Srivastava* does not, nor is it alleged to, remedy the deficiencies in *Thomson*.

B. SRIVASTAVA DOES NOT TEACH WHAT IS ALLEGED, AND THOMSON DOES NOT REMEDY SRIVASTAVA’S DEFICIENCIES

Claim 100 recites in part:

“a source ETL application receiving, from a user, input that selects one or more **database objects** to be transported from a source database to a target database
wherein said source database system includes **source database metadata** that describes **database objects of said source database**”

No combination of *Thomson* and *Srivastava* teaches or suggests the quoted feature.

The Office Action acknowledges that *Thomson* does not teach this quoted feature and relies on Col. 4, lines 31-39 of *Srivastava* to allegedly teach this feature. *Srivastava* describes a system which extracts metadata that is stored embedded in a media file and stores the extracted metadata as annotations in a database separate from the media file.

The Office Action appears to consider the following elements of *Srivastava* to be equivalent to the claimed elements:

Claims	Srivastava
Source ETL application	Metadata extractor
Database objects	Media
Source database	Media file
Target database	Target database
Source database metadata	Metadata (annotations) embedded within the Media in the mediafile

A media file is not a database, and media contained within the file is not a database object. Thus, *Srivastava* does not teach or suggest receiving user input that selects one or more database objects. Furthermore, the metadata embedded within the media of the media file is not database metadata. Thus, neither *Thomson* nor *Srivastava* teach or suggest this feature, and thus no combination of them would teach the feature either.

C. NO MOTIVATION TO COMBINE *THOMSON* AND *SRIVASTAVA*

Even if the technique described in *Srivastava* was performed on objects in a source database, there is still no motivation to combine *Thomson* and *Srivastava*. The motivation provided in the Office Action is stated here in its entirety:

“It would have been obvious to an artisan of ordinary skill in the pertinent [art] at the time the invention was made to have incorporated the teaching of Srivastava into the system of Thomson. The modification would have been obvious because the two references are concerned with the solution to problem of data processing, therefore there is an implicit motivation to combine these references. In other words, the ordinary skilled artisan, during his/her quest for a solution to the cited problem, would look to the cited references at the time the invention was made. Consequently, the ordinary skilled artisan would have been

motivated to combine the cited references since Srivastava's teaching would enable users of the Thomson system to have efficient optimized metadata storage."

The Applicant respectfully disagrees.

The Office Action states that it would have been obvious to incorporate the teaching of *Srivastava* into the system of *Thomson*. However, the Office Action does not specify which teaching of *Srivastava* would have been incorporated into *Thomson*. It appears as though the Office Action suggests that the source database metadata that describes database objects of said source database (which corresponds to the information about the *Thomson*'s report) would be embedded into the one or more database objects (corresponding to *Thomson*'s report) as allegedly taught by *Srivastava*. However, *Thomson*'s report is a query definition and presentation layout that is separate from the metadata provided by a client that describes the location of the originating client, originating and target data sources, and associated rules (paragraph [0057]). Thus, *Thomson*'s report can be created and used in any number of source/target combinations, and the report is customized for the source/target selection when combined with the client-specific metadata. Embedding metadata into the report would require a separate report to be stored for each combination of [originating data source, target data source, report]. Storing so many different report combinations teaches away from solving the cited problem of optimizing storage space. Thus, a person skilled in the art would not have been motivated to incorporate the teaching of *Srivastava* into *Thomson*.

Regarding the assertion that a skilled artisan would look to *Srivastava* to solve the problem addressed by *Thomson* because both references are concerned with data processing, not all references concerned with data processing belong to the same field of endeavor. The Office Action provides no evidence that *Srivastava* is from the same field

of endeavor as *Thomson*. To the contrary, a person skilled in the art of presenting database reports across heterogeneous database types would not think to consult a reference for transforming media files. Manipulating media files is very different than coordinating presentation of items stored in different heterogeneous databases.

In response to the assertion that the motivation to add *Srivastava*'s teaching to *Thomson* would be to enable users of the *Thomson* system to have efficient optimized metadata storage, there is no teaching in the cited passage of *Srivastava* (Col. 1, lines 25-35) or anywhere else in *Srivastava* that *Srivastava* is directed to efficient, optimized metadata storage. Therefore, even if *Srivastava* were to be combined into *Thomson*, there is no evidence that adding the teaching of *Srivastava* would result in *Thomson*'s system having efficient, optimized metadata storage. Furthermore, there is no teaching or suggestion that *Thomson* obtaining efficient, optimized metadata storage was a deficiency in *Thomson* that needed to be solved.

For at least all the above reasons, any combination of *Thomson* and *Srivastava* fails to provide all the features of Claim 100. Therefore, Claim 100 is patentable under 35 U.S.C. §103(a) over the combination of *Thomson* and *Srivastava*. Reconsideration and withdrawal of the rejection is respectfully requested.

D. DEPENDENT CLAIMS PATENTABLE BY VIRTUE OF DEPENDENCY

Each of Claims 101-107 is directly or indirectly dependent on Claim 100 and includes the same distinguishing features as its corresponding independent claim. Thus, Claims 101-107 are patentable over the combination of *Thomson* and *Srivastava* for at least the same reasons as for Claim 101 given above. Therefore, each of Claims 101-107

is patentable under 35 U.S.C. 103(a) over the combination of *Thomson* and *Srivastava*.
Reconsideration and withdrawal of the rejection is respectfully requested.

In addition, each of claims 101-107 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time.

E. CLAIMS 108-115 PATENTABLE FOR SAME REASONS AS ABOVE

Claims 108-115 are method claims corresponding to the method of claims 100, 103-107, and 101-102 that were shown above to be patentable over the combination of *Thomson* and *Srivastava*. Thus, Claims 108-115 are patentable for at least the same reasons that make Claims 100-107 patentable. Therefore, Claims 108-115 are patentable under 35 U.S.C. 103(a) over the combination of *Thomson and Srivastava*.
Reconsideration and withdrawal of the rejection is respectfully requested.

II. NEW CLAIMS 116-131

Support for the new claims can be found in paragraph [0074] of the Specification. All the new Claims 116-131 are dependent on one of the claims already shown to be patentable. Thus, each of Claims 116-131 is patentable for at least all the same reasons as the claim on which it depends. Therefore, Claims 116-131 are patentable under 35 U.S.C. 103(a) over the combination of *Thomson and Srivastava*.

II. CONCLUSION

For the reasons set forth above, Applicant respectfully submits that all pending claims are patentable over the art of record, including the art cited but not applied.

Accordingly, allowance of all claims is hereby respectfully solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Respectfully submitted,

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